

South Coast Air Quality Management District

Statement of Basis

Proposed Title V Renewal Permit

Facility Name: Western Tube & Conduit Corp.
Facility ID: 22092
SIC Code: 3317
Equipment Location: 2001 E. Dominguez Street
Long Beach, CA 90801

Application #(s): 518955
Application Submittal Date(s): 2/16/2011

AQMD Contact Person: Stacey Ebner, Senior Engineer
Phone Number: (909) 396-2504
E-Mail Address: sebiner@aqmd.gov

1. Introduction and Scope of Permit

Title V is a national operating permit program for air pollution sources. Facilities subject to Title V must obtain a Title V permit and comply with specific Title V procedures to modify the permit. This permit replaces the facility's other existing permits. Title V does not necessarily include any new requirements for reducing emissions. It does, however, include new permitting, noticing, recordkeeping, and reporting requirements.

Pursuant to Title V of the federal Clean Air Act and AQMD Rule 3004(f), a Title V permit shall expire five years from the date of issuance unless such permit has been renewed. Accordingly, each facility is required to submit a Title V renewal application and requested the AQMD to renew their Title V permit. The proposed permit incorporates updates to the facility information provided in the facility's Title V renewal application and all rules and regulations that are currently applicable to the facility.

The AQMD implements Title V through Regulation XXX – Title V Permits, adopted by the AQMD Governing Board in order to comply with EPA's requirement that local air permitting authorities develop a Title V program. Regulation XXX was developed with the participation of the public and affected facilities through a series of public workshops, working group meetings, public hearings and other meetings.

The Title V major source threshold for a particular pollutant depends on the attainment status of the pollutant. NO₂, SO₂, CO, and lead are in attainment with federal standards. The status for PM-10 is serious nonattainment. The status for ozone is currently extreme nonattainment.

A Title V renewal permit is proposed to be issued to cover the operations of Western Tube & Conduit Corp. located at 2001 E. Dominguez Street, Long Beach, CA 90801. This facility is subject to Title V requirements because it is a major source.

2. Facility Description

This is an existing facility applying for a Title V permit renewal that is engaged in the manufacturing of metal tubes and conduits. The facility operates galvanizing equipment, coating and drying equipment, internal combustion engines, spray booths, flow coaters, scrubbers, baghouses, afterburners and other supporting equipment.

3. Construction and Permitting History

The facility has been in constant operation with a Title V permit at this location since 2001. A Title V renewal permit was issued to the facility on October 1, 2006 and several permit revisions were subsequently issued to this facility.

4. Regulatory Applicability Determinations

Applicable legal requirements for which this facility is required to comply are required to be identified in the Title V permit (for example, Section D, E, and H of the proposed Title V permit). Applicability determinations (i.e., determinations made by the District with respect to what legal requirements apply to a specific piece of equipment, process, or operation) can be found in the Engineering Evaluations. This facility is not subject to any NSPS requirements. The facility, however, is subject to 40 CFR63 Subpart ZZZZ area source requirements. The NESHAP requirements are reflected in the Title V Permit. In addition, to ensure that the facility is exempt from 40 CFR 63 Subpart MMMM, facility wide permit conditions are specified in the Title V permit limiting the quantity of hazardous air pollutant emissions (HAP) from the facility to less than 10 tons per year and a combination of HAPs to less than 25 tons per year.

5. Monitoring and Operational Requirements

Applicable monitoring and operational requirements for which the facility is required to comply are identified in the Title V permit (for example, Section D, F, and J and Appendix B of the proposed Title V permit). Discussion of any applicable operational requirements can be found in the Engineering Evaluations. All periodic monitoring requirements were developed using strict adherence to the following applicable guidance documents: SCAQMD Periodic Monitoring Guidelines for Title V Facilities (November 1997); CAPCOA/CARB/EPA Region IX Periodic Monitoring Recommendations for Generally Applicable Requirements in SIP (June 1999); and CAPCOA/CARB/EPA Region IX Recommended Periodic Monitoring for Generally Applicable Grain Loading Standards in the SIP: Combustion Sources (July 2001).

The VOC emissions from the three outer diameter coaters, the three inside diameter coaters, the three ovens, coaters on the three galvanizing lines, and the end spray machine are vented to two air pollution control system regenerative thermal oxidizers. The uncontrolled VOC emissions to each oxidizer is greater than the major source threshold for HAPS of 10 tons per year. As a

result, the oxidizers are subject to the Compliance Assurance Monitoring (CAM) requirements of 40 CFR Part 64. Permit conditions were previously added to satisfy the CAM requirements. Such permit conditions were developed using the design criteria and other pertinent requirements identified in 40 CFR 64-Compliance Assurance Monitoring and Technical Guidance Document and in the August 1998 Revised Draft CAM.

The PM emissions from three induction coil stations and three acid pickling tanks are vented to two scrubbers to control the PM₁₀ emissions. Also, the PM emissions from the three galvanizing furnaces and dross containers are vented to two baghouses to control the PM₁₀ emissions. However, since the PM₁₀ emissions to each air pollution control equipment is less than 70 tons per year, the CAM requirements are not applicable to the scrubbers or the baghouses.

6. Permit Features

Permit Shield

A permit shield is an optional part of a Title V permit that gives the facility an explicit protection from requirements that do not apply to the facility. A permit shield is a provision in a permit that states that compliance with the conditions of the permit shall be deemed compliance with all identified regulatory requirements. To incorporate a permit shield into the Title V permit involves submission of applications for change of conditions for each equipment affected by the permit shield. Permit shields are addressed in Rule 3004 (c). This facility has not applied for a permit shield.

Streamlining Requirements

Some emission units may be subject to multiple requirements which are closely related or redundant. The conditions may be streamlined to simplify the permit conditions and compliance. Emission limits, work practice standards, and monitoring, recordkeeping, and reporting requirements may be streamlined. Compliance with a streamlined condition will be deemed compliance with the underlying requirements whether or not the emission unit is actually in compliance with the specific underlying requirement. This facility has not applied for any streamlined conditions.

7. Summary of Emissions and Health Risks

Criteria Pollutant Emissions (tons/year)
Annual Reported Emissions for Reporting Period 2011

Pollutant	Emissions (tons/year)
NO _x	1.708
CO	0.433
VOC	8.138
PM	2.562
SO _x	0.009

**Toxic Air Contaminants Emissions (TAC)
Annual Reported Emissions for Reporting Period 2010**

The Following TACs Were Reported	Emissions (lbs/year)
Toluene	4402.556
Xylenes	2442.486
Ethyl Benzene	412.935
Methanol	338.083
Ammonia	97.532
Ethylene Glycol Monobutyl Ether	63.127
Methylene Chloride	47.232

Health Risk from Toxic Air Contaminants

The facility is subject to review by the Air Toxics Information and Assessment Act (AB2588). The Final Facility Health Risk was approved in 1997 with the following risk factors.

Cancer Risk	0.00 in one million
Acute Hazard Index	0.02
Chronic Hazard Index	0.62

8. Compliance History

As noted, the facility has been in constant operation with a Title V permit since 2001. The facility has been subject to both self-reporting requirements and AQMD inspections. The facility has had no citizen complaints filed or Notice to Comply or Notice of Violation issued in the last two years.

9. Compliance Certification

By virtue of the Title V permit application and issuance of this Title V renewal permit, the reporting frequency for compliance certification for the facility shall be annual.